the Wolfsberg Group

Financial Institution Name:	First Abu Dhabi Bank PJSC	
Location (Country) :	United Arab Emirates	

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office & subsidiary level for which any branches would be considered covered by that parent/subsidiary DDQ. This questionnaire should not cover more than one LE. Each question in the DDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differed for one of its branches this needs to be highlighted and detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

No#	Question	Answer
S. St. St.	TITY & OWNERSHIP	
1	Full Legal Name	First Abu Dhabi Bank PJSC ('FAB')
2	Append a list of branches which are covered by this questionnaire	Malaysia (Labuan), US (as a branch of our subsidiary FAB Americas domiciled in Curacao), Bahrain, Kuwait, Oman, Sudan, London, Singapore, Egypt, Qatar, Jordan, India, Paris and Hong Kong.
3	Full Legal (Registered) Address	FAB Building, Khalifa Business Park, Al Qurm District, P.O. Box 6316, Abu Dhabi, UAE.
4	Full Primary Business Address (if different from above)	N/A
5	Date of Entity incorporation/ establishment	13 February 1968
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Abu Dhabi Stock Exchange and the ticker is FAB.
6 b	Member Owned/ Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	•
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	None
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	Cayman and Curacao
9	Name of primary financial regulator / supervisory authority	Central Bank of UAE
10	Provide Legal Entity Identifier (LEI) if available	2138002Y3WMK6RZS8H90

	<u> </u>	
1.1	Provide the full legal riame of the ultimate parent (if different from the Entity completing the DDQ)	N/A
12	Jurisdiction of licensing authority and regulator of ultimate parent	Central Bank of UAE
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	Yes
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	Yes
13 f	Financial Markets Trading	Yes
13 4	Securities Services/ Custody	Yes
13 g 13 h	Broker/Dealer	Yes
	Multilateral Development Bank	No.
13 i 13 i	Other	(10)
14	Does the Entity have a significant (10% or more) offshore customer base, either by number of customers or by revenues (where off-	No:
	shore means not domicited in the jurisdiction where bank services are being provided)?	
14 a	If Y, provide details of the country and %	Please refer to our annual reports on our website www.bankfab.ae
15	Select the closest value:	
16 a	Number of employees	5001-10000
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes ·
16 a	If N, clarify which questions the difference/s relate to and the branchi/es that this applies to,	
		Please note that local laws and regulations may deviate from Group policy.

,	DOUCTS & SERVICES Does the Entity offer the following products and	
	services:	
a	Correspondent Banking	Yes
	fΥ	
a2	Does the Entity offer Correspondent Banking	V
- 1	services to domestic banks?	Yes
7 a3	Does the Entity allow domestic bank clients to	No
	provide downstream relationships?	INO
7 a4	Does the Entity have processes and procedures	
	in place to identify downstream relationships	Yes
	with domestic banks?	·
7 a5	Does the Entity offer correspondent banking	Yes
	services to Foreign Banks?	
7 a6	Does the Entity allow downstream relationships	No '
	with Foreign Banks?	
7 a7	Does the Entity have processes and procedures	
	in place to identify downstream relationships	Yes
	with Foreign Banks?	
7 a8	Does the Entity offer correspondent banking	Yes
	convices to regulated MSBs/MVTS?	100
7 a9	Does the Entity allow downstream relationships	No.
	with MSRs/MVTS2	1994.
7 a10	Does the Entity have processes and procedures	
	in place to identify downstream relationships	Yes
	with MSR /MVTS?	
7 b	Private Banking (domestic & international)	Yes
	Trade Finance	Yes
7 d	Payable Through Accounts	No.
7 e	Stored Value Instruments	Yes
7 f	Cross Border Bulk Cash Delivery	No
7 g	Domestic Bulk Cash Delivery	No
	International Cash Letter	Yes
71	Remote Deposit Capture	Yes
/ i	Virtual /Digital Currencies	No.
	Low Price Securities	No
7 k	Hold Mail	No.
71		Yes
7 m	Cross Border Remittances Service to walk-in customers (non-account	
17 n		Yes
	holders)	No
70	Sponsoring Private ATMs	
7-p	Other high risk products and services identified	None
	by the Entity	
8	Confirm that all responses provided in the	
	above Section PRODUCTS & SERVICES are	Yes
	representative of all the LE's branches	
8 a	If N, clarify which questions the difference/s	Not all our branches offer the same services as head-office or each other:
	relate to and the branch/es that this applies to.	1447 Am with windings and the control of the contro
8 b	If appropriate, provide any additional	Please note that local laws and regulations may deviate from Group policy.
	information / context to the answers in this	
	section,	I

19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards	
	regarding the following components:	
19 a	Appointed Officer with sufficient	Yes
	experience/expertise	
19 b	Cash Reporting	No
19 c.	CDD	Yes
19 d	EDD	Yes
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19 I	Adverse Information Screening	Yes
19.m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 o	Transaction Monitoring	Yes
20	How many full time employees are in the	
	Entity's AML, CTF & Sanctions Compliance	50+
	Department?	
21	Is the Entity's AML, CTF & Sanctions policy	
	approved at least annually by the Board or	Yes
	equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior	
	Mänagement Committee receive regular	Yes
	reporting on the status of the AML, CTF &	1.02
	Sanctions programme?	
23	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions	Yeş
	programme?	
23 a	If Y, provide further details	We use third party agents for selling some retail products (certain credit cards and merchant POS)
	·	and we rely on them to perform client due diligence. This process is approved by the Central Bank. It
		is all in local AED currency and does affect cross-border FCY transactions.
0.4	Confirm that all responses provided in the above	
24	Section AML, CTF & SANCTIONS Programme	l _{No}
	are Representative of all the LE's branches	117
24 -	if N, clarify which questions the difference/s	Local jurisdictions will follow Group policy however there are instances where local regulation will
24 a	relate to and the branch/es that this applies to:	Supersede, Also, third parties (Q23) are only used in UAE.
	rigitate to and the plancines that this applies to:	supersede, Also, third parties (023) are only used in OAE.
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24 b	If appropriate, provide any additional	Q24 is no because different jurisdictions may deviate from Group policy based on local regulatory.
	information / context to the answers in this	requirements
	section.	Please note the cash reporting (19-b) requirement above is not applicable to the UAE but is in certain
I		jurisdictions where we have presence which we adhere to accordingly.

. AN	TI BRIBERY & CORRUPTION	
:5	Has the Entity documented policies, and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes:
6	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes·
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yës
29	is the Entity's ABC programme applicable to:	
29 a	Joint ventures	Yes
29 b	Third parties acting on behalf of the Entity	Yes
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes.
32.	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	No
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	No
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	

35	Does the Entity's ABC EWRA cover the inherent	
	risk components detailed below:	
35 a:	Potential liability created by intermediaries and other third-party providers as appropriate	
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermedianes	
35 c	Transactions, products or services; including those that involve state-owned or state-controlled entities or public officials	
35 d	Comption risks associated with gifts and nospitality, hiring/internships, charitable fonations and political contributions	
35 e	Changes in business activities that may materially increase the Entity's corruption risk	
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
37	Does the Entity provide mandatory ABC training to:	
37 a	Board and Senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
37·f	Non-employed workers as appropriate (contractors/consultants)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Nο
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	
39 b	I appropriate; provide any additional information context to the answers in this section.	Please note that local laws and regulations may deviate from Group policy. In addition, while FAB does not include ABC in its EWRA programme, however if is being considered going forward. Furthermore, MI to management will include instances on breach and training exceptions only - there is no regular ABC MI.

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7. AM	L, CTF & SANCTIONS RISK ASSESSMEN Does the Entity's AML & CTF EWRA cover the	
7	inherent risk components detailed below:	Yes
7 a	Client	Yes
7 b	Product	Yes
7 C	Channel	Nó
7 d	Geography -	Yes
18	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
8 a	Transaction Monitoring	Yes
8 b	Customer Due Diligence	Yes
8 c	PEP Identification	Yes
18 d	Transaction Screening	Yes
18 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	No.
49 a.	If N, provide the date when the last AML & CTF EWRA was completed.	Pre-merger so 2016.
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
60 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes
61	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes.
51 a	Gustomer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	No ·
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	No
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	The Group EWRA model is being developed as a post-merger objective which will include our affiliates but these are currently not aligned:
53 b	If appropriate, provide any additional information / context to the answers in this section.	Please note that local laws and regulations may deviate from Group policy. Q47, C - channel is being considered as part of a Group review of our Customer Risk Assessment Model. Q49 - the EWRA for FAB is currently being developed post merger.

54	Does the Entity verify the Identity of the customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
67 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Other (Specify the percentage) - 5%
59	Does the due diligence process result in customers receiving a risk classification?	Yes
60	if Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 P	Geography	Yes
60 c	Business Type/industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	We also assess nationality of key individuals and client type (in addition to industry). We assess direct and indirect beneficial ownership above 5% up to a natural person.

	Te	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	
63 b	Manual	
63 C	Combination of automated and manual	Yes
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
65	if Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	
66 b	Manual	
66 c	Combination of automated and manual	Yes
67	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
68	Does the Entity have a process to review and update customer Information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	No

70:	From the list below, which categories of customers or industries are subject to EDD and/ or are restricted, or prohibited by the Entity's FCC programme?	
70 a	Non-account customers	
70 b	Offshore customers	
70 c	Shell banks	Prohibited Prohibited
70 d	MVTS/ MSB customers	EDD & Restricted on a risk based approach
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	
70 h1	if EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
70 i	Arms, defense, military	EDD & Restricted on a risk based approach
70]	Atomic power	EDD on a risk based approach
70 k	Extractive industries	
70 1	Precious metals and stones	EDD on a risk based approach
70 m	Unregulated charities	Prohibited
70 n	Regulated charities	EDD & Restricted on a risk based approach
70 0	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	Prohibited
	Marijuana	
70 r.	Embassies/Consulates	Prohibited
70 s		EDD on a risk based approach
70 t	Gambling	Prohibited
70 u	Payment Service Provider	
70°V	Other (specify)	
71	If restricted, provide details of the restriction	Compliance and management must approve any additions and renewals.
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Please note that local laws and regulations may deviate from Group policy.
73 b	if appropriate, provide any additional information / context to the answers in this section.	Q70 - some are blank because the level of due diligence is determined by our risk assessment model. They are not default high risk clients.

R MO	NITORING & REPORTING	
74	Does the Entity have risk based policies,	
	procedures and monitoring processes for the	
	identification and reporting of suspicious	Yes
	activity?	
75	What is the method used by the Entity to	
5	monitor transactions for suspicious activities?	
75 a	Automated	Yes
75 b	Manual	
75 c	Combination of automated and manual	
76	If manual or combination selected, specify what	
	type of transactions are monitored manually	
	Does the Entity have regulatory requirements to	
77	report currency transactions?	No
77 a	If Y, does the Entity have policies, procedures	
	andprocesses to comply with currency	
	reporting requirements?	
78	Does the Entity have policies, procedures and	
	processes to review and escalate matters	
	arising from the monitoring of customer	Yes
	transactions and activity?	
79	Confirm that all responses provided in the	
, ,	above Section MONITORING & REPORTING	
	are representative of all the LE's branches	No
	If N. alacif which avactions the difference/s	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Please note that local laws and regulations may deviate from Group policy.
	leate to and the brancises that this applies to	
70 h	If appropriate, provide any additional	I I I I I I I I I I I I I I I I I I I
79 b	information / context to the answers in this	There is no currency reporting threshold in the UAE, however there are in other jurisdictions in which we operate, which are adhered to. Q61, Q63 and Q64 - Going forward, the bank will be implementing
	section.	Fircosoft for PEP and adverse media/negative news screening.
	Tanana and	I HOUSER OF THE WAR ACTION TO A CONTROL OF THE CONT
Q PA	YMENT TRANSPARENCY	CONTRACTOR OF A STANDARD STAND
80	Does the Entity adhere to the Wolfsberg Group	
7.7	Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and	
	processes to [reasonably] comply with and have	
	controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes
81 b	Local Regulations	Yes
81 b1	Specify the regulation	Please refer to the regulations listed on the Central Bank of UAE website: www.centralbank.ae
DATE DESCRIPTION	numanus mining si mining suudan paan (1811) (1800 – 18	
81 c	If N, explain	
	December Settle have present in place to	
	Does the Entity have processes in place to	
82		Tv
82	respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
82	other entities in a timely manner?	Yes
	other entities in a timely manner?	Yes
82	other entities in a timely manner? Does the Entity have controls to support the	Yes
	other entities in a timely manner? Does the Entity have controls to support the inclusion of required and accurate originator	
	other entities in a timely manner? Does the Entity have controls to support the	

84	Does the Entity have controls to support the	
	inclusion of required beneficiary in international	
	payment messages?	Yes
	Paylitani	! `
85	Confirm that all responses provided in the	
90	aboveSection PAYMENT TRANSPARENCY	
		Yes
	are representative of all the LE's branches	'
·	The same of the sa	
85 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional	Please note that local laws and regulations may deviate from Group policy.
	information / context to the answers in this	
	section.	
	<u> </u>	
10. S.	ANCTIONS	
86	Does the Entity have a Sanctions Policy	
90		
	approved by management regarding	
	compilance with sanctions law applicable to the	1
l	Entity, including with respect its business	Yes
l	conducted with, or through accounts held at	ı
l	foreign financial institutions?	Į l
l	and it is the same of the same of the same of	
L		
87	Does the Entity have policies, procedures, or	
l i	other controls reasonably designed to prevent]
l	the use of another entity's accounts or services]
1	this use of direction county a decodification and vices]
	in a manner causing the other entity to violate	36
	sanctions prohibitions applicable to the other	Yes
[entity (including prohibitions within the other	
	entity's local jurisdiction)?	
l	entity 5 looks junious and	
l		
88	Does the Entity have policies, procedures or	
l	other controls reasonably designed to prohibit	
l	land/or detect actions taken to evade applicable	
l	sanctions prohibitions, such as stripping, or the	
		No
1	resubmission and/or masking, of sanctions	
	relevant information in cross border	
1	transactions?	
1		
89	Does the Entity screen its customers, including	
	beneficial ownership information collected by	
l	the Entity, during onboarding and regularly	Yes
1		i tes
1	thereafter against Sanctions Lists?	
L		
90	What is the method used by the Entity?	
90 a	Manual	
90 b	Automated	
		Yes
90 c	Combination of Automated and Manual	1,00
91	Does the Entity screen all sanctions relevant	
ļ	data, including at a minimum, entity and	
	location information, contained in cross border.	Yes
i	transactions against Sanctions Lists?	
1	Periodesiane affernia established proves	
02	What is the method used by the Entity?	
92		
92 a	Manual	1
92·b	Automated	Yes
92 c	Combination Automated and Manual	
93	Select the Sanctions Lists used by the	
1	Entity in its sanctions screening processes:	
1	Tital telle actionarie associated bracamage.	I
93 a	Consolidated United Nations Security Council	
" "	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
1		
93 b	United States Department of the Treasury's	
100,0	Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
L		
93 c	Office of Financial Sanctions Implementation	
1220	HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
1	Time (or or)	
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
JU 4		
93 e	Lists maintained by other G7 member countries	la companya di managana di
1	1	Used for screening customers and beneficial owners and for filtering transactional data
	1	

93 f	Other (specify)	We use the lists of other countries where we have presence in addition to our internal deny list (clients previously exited)
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	Same day to 2 days
95	When updates or additions to the Sanctions. Lists are made, how many business days, before the Entity updates their active manual and / or automated screening system against:	
95 a	Customer Dața	For legacy FGB customers this is done overnight. Legacy NBAD customers are currently screened manually at on-boarding, trigger events, on-going reviews and changes made to any lists. There is a manual process in place to update our records as soon as practically possible.
95 b	Transactions	Overnight from WorldCheck. Screening will happen pre-release at the next transaction.
96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Yes
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
9,7 b	If appropriate, provide any additional information / context to the answers in this section.	Legacy NBAD -SWFT message types from 1 to 8 and 999 (in/out) are screened. Legacy FGB outward SWFT message type 1, 2, 7 are screened. Inward SWFT messages are not screened. All transactions (domestic, international, inward, outward) Including RTGS in each jurisdiction will be screened with deployment of Firosoft.
11. T	RAINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes:	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	Yes.
99 a.	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 c	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	Yes
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Ÿas

01	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
02	Confirm that all responses provided in the aboveSection TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	Please note that local laws and regulations may deviate from Group policy.
12 0	UALITY ASSURANCE /COMPLIANCE TE	STING
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	Please note that local laws and regulations may deviate from Group policy.
13. A	UDIT	NOV. 1985年 1986年 1987年
106	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly

108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	Yes
108 b	KYC / CDD / EDD and underlying methodologies	Yes
108 c	Transaction Monitoring	Ýes
108 d	Transaction Screening including for sanctions	Yes
108.e	Name Screening & List Management	Yeş
108/f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j	Suspicious Activity Filing	Yes [.]
108 k	Enterprise Wide Risk Assessment	Yeş
1081	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy, and completeness?	Yes
110	Confirm that all responses provided in the above Section, AUDIT are representative of all the LE's branches	Yes [.]
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	Please note that local laws and regulations may deviate from Group policy.

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2018 (CBDDQ V1.2) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) First Abu Dhabi Bank PJSC (Bank name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. First Abu Dhabi Bank PJSC (Bank name) understands the critical importance of having effective and Sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations. (Bank name) recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards. First Abu Dhabi Bank PJSC (Bank name) further certifies it complies with/is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis. (Bank name) commits to file accurate supplemental First Abu Dhabi Bank PJSC information on a timely basis. (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of First Abu Dhabi Bank PJSC (Bank name) (Signature & Date) (Signature & Date)